

U.S. Department of Justice

United States Attorney Southern District of New York

The Silvio J. Mollo Building One Saint Andrew's Plaza New York, New York 10007

July 29, 2024

BY ECF

The Honorable Laura Taylor Swain United States Chief District Judge Southern District of New York 500 Pearl Street New York, New York 10007 (212) 805-0426

Re: <u>United States v. Gery Shalon</u>,

15 Cr. 333 (LTS) and 17 Cr. 254 (LTS)

Dear Chief Judge Swain:

The Government and defense counsel have been conferring regarding a joint response directed by the Court's Order dated July 19, 2024 (ECF No. 302). The Government anticipates submitting a request to partially unseal the Government's sentencing submission related to defendant Gery Shalon, with appropriate continuing redactions. Defense counsel is reviewing the proposed redactions and potential portions to be unsealed, and has requested an extension until this Friday, August 2, 2024 to confer with the defendant and complete the process necessary to file the joint response. The Government joins the request.

Respectfully submitted,

DAMIAN WILLIAMS United States Attorney

By: /s/ Vladislav Vainberg

Vladislav Vainberg Noah Solowieczyk Assistant United States Attorneys (212) 637-1029 / 2473